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September 2, 2016

**VIA E-MAIL TRANSMISSION
AND ECF FILING**

The Honorable Martin Glenn
United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
Alexander Hamilton Custom House
One Bowling Green
New York, New York 10004

**Re: In re Motors Liquidation Company, *et al.*
Case No. 09-50026 (MG)**

Letter Regarding Update on Related Proceedings

Dear Judge Glenn:

King & Spalding LLP is co-counsel with Kirkland & Ellis LLP for General Motors LLC (“**New GM**”) in the above-referenced matter. Pursuant to Judge Gerber’s Endorsed Order dated May 5, 2015 [Dkt. No. 13131], we write to update the Court regarding developments in proceedings relating to New GM.

Yesterday, New GM filed a letter with the Court advising it that in MDL 2543 (i) the *Norville* plaintiff filed a motion for partial summary judgment arguing that New GM is the mere continuation of General Motors Corporation (n/k/a Motors Liquidation Company) and (ii) New GM was filing its response (“**New GM Response**”). A copy of the New GM Response filed yesterday is attached as **Exhibit “A.”** Today, the *Norville* plaintiff withdrew her motion for partial summary judgment. A copy of her Notice of Withdrawal is attached as **Exhibit “B.”**

If the Court has any questions or needs additional information, please let me know.

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Respectfully submitted,

/s/ Arthur Steinberg

Arthur Steinberg

AJS/sd
Encl.

cc: Initial Group Set Forth On Schedule "1" Annexed Hereto.

SCHEDULE 1

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Parties to the Motion to Enforce, filed by New GM on June 1, 2016 [Dkt No. 13634]

<p>Tab Turner, Esq. TURNER & ASSOC. 4705 Somers Ave., S-100, North Little Rock, AR 72116 T: 501-791-2277 – Phone tab@tturner.com</p> <p><i>Counsel for Tibbetts and Chapman Plaintiffs</i></p>	<p>William Weintraub Gregory Fox GOODWIN PROCTER LLP The New York Times Building 620 Eighth Avenue New York, NY 10018 T: 212-813-8800 wwintraub@goodwinprocter.com gfox@goodwinprocter.com</p> <p><i>Designated Counsel for Certain Pre-Sale Accident Plaintiffs and Post-Sale Accident Plaintiffs</i></p>
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Parties to the Motion to Enforce filed by New GM on June 24, 2016 [Dkt No. 13655]

<p>Laurence B. Springberg, Esq. THOMAS & SPRINGBERG 844 East Sahara Ave. Las Vegas, NV 89104-3017 T: (702) 731-9222 lspringberg@thomasandspringberg.com</p> <p><i>Counsel for the Atanaw Plaintiff</i></p>	<p>Martin E. Regan, Esq. REGAN LAW PLC 2125 St Charles Ave. New Orleans, LA 70130 T: (504) 522-7260 mregan@reganlaw.net lrayon@reganlaw.net</p> <p><i>Counsel for the Barbot Plaintiffs</i></p>
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<p>Paul Vernon Minix, Jr. Dewitt County Jail 208 E. Live Oak Cuero, TX 77954</p> <p><i>Minix – Pro Se Plaintiff</i></p>	<p>Paul Minix 2330 Quail Lane Longview, Texas 75602</p> <p><i>Minix – Pro Se Plaintiff</i></p>

Parties Subject to the Pilgrim Motion to Enforce

<p>André E. Jardini, Esq. K.L. Myles, Esq. KNAPP, PETERSEN & CLARKE 550 North Brand Boulevard, Suite 1500 Glendale, CA 91203 T: (818) 547-5000 aej@kpclegal.com klm@kpclegal.com</p> <p><i>Counsel for the Pilgrim Plaintiffs</i></p>	
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